

Defendants.

STIPULATED MOTION TO MODIFY SCHEDULING ORDER

On July 28, 2022, this Court approved the parties' joint stipulated scheduling order for the parties' cross-motions for summary judgment. ECF No. 43. Pursuant to that schedule, Defendants timely lodged the administrative record on December 16, 2022. ECF No. 44.

Plaintiffs, with the stipulated consent of Defendants, now respectfully request that the Court modify the summary judgment scheduling order in this case to grant an extension of Plaintiffs' deadline to file a motion to supplement the administrative record from January 16, 2023 to February 3, 2023. The parties further request that the summary judgment briefing schedule be vacated until the parties or the Court has resolved any dispute over the contents of the administrative record, at which time the parties will present a revised briefing schedule to the Court for its consideration that mirrors the staggered briefing schedule and page limitations of the current schedule.

Plaintiffs submit that good cause exists for this request because Plaintiffs require additional time to consult and conduct a meet and confer with Defendants prior to the filing of any motions to supplement the administrative record. On January 11, 2023, Plaintiffs conferred with Defendants regarding this request, and Defendants agreed to the requested extension of the deadline. This is the first stipulation for an extension of time to file this motion.

Respectfully submitted this 13th day of January, 2023.

/s/ Jessica Blome

Jessica L. Blome

(Cal. Bar No. 314898, admitted pro hac vice)

Alexandra Monson

(Cal. Bar No. 324794, admitted pro hac vice)

GREENFIRE LAW, PC

P.O. Box 8055

Berkeley, CA 94707

(510) 900-9502

TODD KIM

Assistant Attorney General

U.S. Department of Justice

Environment & Natural Resources Division

S. JAY GOVINDAN, Section Chief

BRIDGET K. MCNEIL, Assist. Section Chief

/s/ Chris Carrara

CHRISTIAN CARRARA, Trial Attorney

(NJ Bar # 317732020)

Wildlife & Marine Resources Section

jblome@greenfirelaw.com
amonson@greenfirelaw.com

Danielle M. Holt
(Nevada Bar No. 13152)
DE CASTROVERDE LAW GROUP
1149 S Maryland Pkwy
Las Vegas, NV 89104
Ph (702) 222-9999
Fax (702) 383-8741
danielle@decastroverdelaw.com

Attorneys for Plaintiffs

Ben Franklin Station
P.O. Box 7611
Washington, D.C. 20044
Tel: (202) 598-9736
Fax: 202-305-0275
Christian.carrara@usdoj.gov

Of Counsel:
Janell M. Bogue
U.S. Dep't of the Interior
Office of the Solicitor
Pacific Southwest Region

Attorneys for Federal Defendants

IT IS SO ORDERED.



HON. CARLA BALDWIN
UNITED STATES MAGISTRATE JUDGE

DATED: January 13, 2023